

365 RIFLE CAMP ROAD  
WOODLAND PARK, NEW JERSEY 07424  
973-247-9000  
973-247-9199 (FAX)

1500 LAWRENCE AVENUE  
CN7807  
OCEAN, NEW JERSEY 07712  
732-922-1000  
732-922-6161 (FAX)

214 CARNEGIE CENTER  
SUITE 112  
PRINCETON, NEW JERSEY 08540  
609-751-5551

140 GRAND STREET  
SUITE 705  
WHITE PLAINS, NEW YORK 10601  
800-569-3886

41 UNIVERSITY DRIVE  
SUITE 400  
NEWTOWN, PENNSYLVANIA 18940  
267-757-8792

www.ansellgrimm.com

RICHARD B. ANSELL ‡  
PETER S. FALVO, JR.  
JAMES G. AARON  
PETER B. GRIMM  
MITCHELL J. ANSELL  
BRIAN E. ANSELL ‡  
ALLISON ANSELL †  
MICHAEL V. BENEDETTO  
DAVID B. ZOLOTOROFF  
DONNA L. MAUL\*  
RICK BRODSKY\*  
LAWRENCE H. SHAPIRO □  
ROBERT A. HONECKER, JR. □ §  
JENNIFER S. KRIMKO  
FREDERICK C. RAFFETTO~  
JOSHUA S. BAUCHNER\*  
DAVID J. BYRNE □  
ANDREA B. WHITE \*\*  
EDWARD J. AHEARN

JASON S. KLEIN\*  
MELANIE J. SCROBLE  
BARRY M. CAPP\* Δ  
DOUGLAS A. DAVIE\*  
ELYSA D. BERGENFELD  
RICHARD B. LINDERMAN □  
CRAIG D. GOTTILLA\* □  
KEVIN M. CLARK  
KRISTINE M. BERGMAN □  
JESSICA T. ZOLOTOROFF  
TARA K. WALSH\*  
RAHOO PATEL\*  
NICOLE D. MILLER □  
ALFRED M. CASO  
ANTHONY J. D'ARTIGLIO\*  
SETH M. ROSENSTEIN\*  
ASHLEY V. WHITNEY\*  
COURTNEY E. DUNN\*

COUNSEL  
HON. ANTHONY J. MELLACI, JR., J.S.C. (RET)  
STACEY R. PATTERSON\*  
JAMES A. SYLVESTER  
ROY W. HIBBERD ▽ Δ  
HON. RAYMOND A. HAYSER, J.T.C. (RET)  
KELLY M. CAREY

RETIRED  
ROBERT I. ANSELL  
LISA GOLDWASSER\*

IN MEMORIAM  
LEON ANSCHELEWITZ (1929-1986)  
MAX M. BARR (1929-1993)  
MILTON M. ABRAMOFF (1935-2004)  
DAVID K. ANSELL † (1962-2019)

LICENSED ALSO IN:  
Δ D.C. □ MASS. \* N.Y. \* WASH.  
□ PENN. ~ FLA. ▽ CALIF.

† FELLOW, AMERICAN  
ACADEMY OF MATRIMONIAL  
LAWYERS

‡ CERTIFIED BY THE SUPREME  
COURT OF NEW JERSEY AS A  
CIVIL TRIAL ATTORNEY

§ CERTIFIED BY THE SUPREME  
COURT OF NEW JERSEY AS A  
CRIMINAL TRIAL ATTORNEY

\* CERTIFIED BY THE SUPREME  
COURT OF NEW JERSEY AS A  
MATRIMONIAL LAW ATTORNEY

**Reply to: Woodland Park**  
**Telephone: (973) 247-9000**  
**Fax: (973) 247-9199**  
**Email: [jb@ansellgrimm.com](mailto:jb@ansellgrimm.com)**

February 2, 2022

### Via ECF

Hon. Alison J. Nathan, U.S.D.J.  
United States District Court for the  
Southern District of New York  
40 Foley Square, Room 2102  
New York, New York 10007

Hon. Debra Freeman, U.S.M.J.  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Jeffrey M. Goldman v. Sol Goldman Investments LLC, et al.*  
Civil Action No.: 1:20-cv-6727

Dear Judge Nathan and Judge Freeman:

As you are aware, this firm represents Defendants Sol Goldman Investments LLC, Solil Management, LLC, and Jane H. Goldman (collectively, "Defendants") in the above styled matter.

In accordance with Judge Nathan's January 28, 2022 order (ECF 90), we write to inform the Court that the deposition of Ms. Fleytas, which was ordered by Judge Freeman, has been scheduled for February 7, 2022 at 10:00 a.m. Counsel for Plaintiff confirmed their availability, and Ms. Fleytas did the same. While the subpoena is still out for service at the time of this letter being written, a copy of the subpoena was sent to Ms. Fleytas via email one day after Judge Nathan's order was issued. We will provide a further status update to the Court once the deposition has occurred as required by Judge Nathan's order.

Honorable Alison J. Nathan, U.S.D.J.

Honorable Debra Freeman, U.S.M.J.

February 2, 2022

Page 2

We are available to discuss this, or any other matter, at the Court's convenience. ~~We thank Your Honor for your attention to this matter.~~

Respectfully,

A handwritten signature in blue ink, appearing to read 'J. Bauchner', with a horizontal line extending to the right.

---

Joshua S. Bauchner, Esq.  
Ansell Grimm & Aaron, P.C.  
*Attorneys for Defendants*

cc: All counsel of record (via ECF)